

Mr. Richard Karney
Department of Energy
ENERGY STAR Window Program
Fax: (202) 586-4617
E-mail: richard.karney@ee.doe.gov

March 26, 2003

Re: ENERGY STAR Window Proposed Revisions

Dear Mr. Karney:

As the **National Sales Manager** of *Crystal Windows and Doors* in Flushing, NY, I am deeply concerned about the Department of Energy's February 11, 2003 ENERGY STAR proposal for Windows, Doors, and Skylights program. *(Statement about what the company produces and why the 3-Zone proposal would negatively impact company. Example: The 3-zone criteria would have a negative impact our manufacturing costs and would provide the consumer with less energy savings.)* To that end, I strongly recommend the Department **adopt the 4-Zone proposal** and **abandon the 3-Zone proposal** based on the following reasons:

- The 4-Zone proposal saves more energy annually, based on the Department's own analysis and documents.
- The 4-Zone proposal preserves choice of window glazing technology in the market (hard coat and soft coat low-E) allowing window manufacturers and consumers to benefit from competitive market place pricing.
- The 4-Zone proposal separates climate zones appropriately. The 4-Zone map separates the upper central and lower central sections of the country, such that New York and Phoenix are in two different climate zones. In contrast, the 3-Zone map proposal puts both New York and Phoenix in the same climate zone, which is not reality.
- As a window manufacturer, the 4-Zone proposal would be a simple change for us to implement as *(labeling of windows for ENERGY STAR can be easily done through our computer system, etc. what else?)*

In summary, the 4-zone proposal is good for the industry, the economy, and the consumer. Based on the above, *Crystal Windows and Doors* strongly opposes the 3-Zone proposal and recommends adoption of the 4-Zone proposal as it will save more energy and maintain a key energy efficient technology, namely pyrolytic technology (hard coat), in the market.

Sincerely,

James Barbara
National Sales

Cc: Congressman Gary L. Ackerman Fax: (202) 225-1589
Senator Hillary Rodham Clinton Fax: (202) 228-0282
Senator Charles E. Schumer Fax: (202) 228-3027